

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

JENNIFER PINCKNEY, PERSONAL)
REPRESENTATIVE OF THE ESTATE OF) Civil Action No. 2:16-cv-2350-RMG
CLEMENTA PINCKNEY,)

Plaintiff,)

v.)

THE UNITED STATES OF AMERICA,)

Defendant.)

JENNIFER PINCKNEY,)

Plaintiff,)

v.)

THE UNITED STATES OF AMERICA,)

Defendant.)

JENNIFER PINCKNEY, individually and as)
Parent, Natural Guardian and Next Friend of)
M.P., a minor,)

Plaintiff,)

v.)

THE UNITED STATES OF AMERICA,)

Defendant.)

TYRONE SANDERS, Personal Representative)	
of the ESTATE OF TYWANZA SANDERS,)	Civil Action No. 2:16-cv-2354-RMG
)	
Plaintiff,)	
)	
v.)	
)	
THE UNITED STATES OF AMERICA,)	
)	
Defendant.)	
)	
<hr/> FELICIA SANDERS,)	
)	Civil Action No. 2:16-cv-2355-RMG
Plaintiff,)	
)	
v.)	
)	
THE UNITED STATES OF AMERICA,)	
)	
Defendant.)	
)	
<hr/> FELICIA SANDERS, individually and as)	
Legal Custodian of K.M., a minor,)	Civil Action No. 2:16-cv-2356-RMG
)	
Plaintiff,)	
)	
v.)	
)	
THE UNITED STATES OF AMERICA,)	
)	
Defendant.)	
)	
<hr/> ANTHONY THOMPSON and KEVIN)	
SINGLETON, as Co-Personal Representatives)	Civil Action No. 2:16-cv-2357-RMG
of the ESTATE OF MYRA SINGLETON)	
QUARLES THOMPSON,)	
)	
Plaintiff,)	
)	
v.)	
)	
THE UNITED STATES OF AMERICA,)	
)	
Defendant.)	
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POLLY SHEPPARD,)	
)	Civil Action No. 2:16-cv-2358-RMG
Plaintiff,)	
)	
v.)	
)	
THE UNITED STATES OF AMERICA,)	
)	
Defendant.)	
)	
WALTER B. JACKSON, Personal)	
Representative of the ESTATE OF SUSIE)	Civil Action No. 2:16-cv-2359-RMG
JACKSON,)	
)	
Plaintiff,)	
)	
v.)	
)	
THE UNITED STATES OF AMERICA,)	
)	
Defendant.)	
)	
LAURA MOORE, Personal Representative of)	
the ESTATE OF ETHEL LANCE,)	Civil Action No. 2:16-cv-2360-RMG
)	
Plaintiff,)	
)	
v.)	
)	
THE UNITED STATES OF AMERICA,)	
)	
Defendant.)	
)	
DANIEL L. SIMMONS, JR., as Personal)	
Representative of the ESTATE OF DANIEL)	Civil Action No. 2:16-cv-2378-RMG
L. SIMMONS, SR.,)	
)	
Plaintiff,)	
)	
v.)	
)	
THE UNITED STATES OF AMERICA,)	
)	
Defendant.)	
)	

SHALISA COLEMAN, as Personal)	
Representative of the ESTATE OF)	Civil Action No. 2:16-cv-2405-RMG
SHARONDA COLEMAN-SINGLETON,)	
)	
Plaintiff,)	
)	
v.)	
)	
THE UNITED STATES OF AMERICA,)	
)	
Defendant.)	
)	
ANTHONY THOMPSON,)	
)	Civil Action No. 2:16-cv-2406-RMG
Plaintiff,)	
)	
v.)	
)	
THE UNITED STATES OF AMERICA,)	
)	
Defendant.)	
)	
ARTHUR STEPHEN HURD, as Personal)	
Representative of the ESTATE OF CYNTHIA)	Civil Action No. 2:16-cv-2407-RMG
GRAHAM HURD,)	
)	
Plaintiff,)	
)	
v.)	
)	
THE UNITED STATES OF AMERICA,)	
)	
Defendant.)	
)	
ARTHUR STEPHEN HURD,)	
)	Civil Action No. 2:16-cv-2409-RMG
Plaintiff,)	
)	
v.)	
)	
THE UNITED STATES OF AMERICA,)	
)	
Defendant.)	
)	

BETHANE MIDDLETON-BROWN, Personal)	
Representative of the ESTATE OF DEPAYNE)	Civil Action No. 2:16-cv-2746-RMG
MIDDLETON-DOCTOR,)	
)	
Plaintiff,)	
)	
v.)	
)	
THE UNITED STATES OF AMERICA,)	
)	
Defendant.)	
)	

JOINT NOTICE REGARDING CONSOLIDATION

On January 31, 2017, the Court entered an order in these cases in which the Court stated, *inter alia*, that it “it is considering consolidation of” these cases and “designating *Sanders v. United States*, Civ. No. 2:16-2356-RMG as the Master Docket for the consolidated cases”; and the Court directed the parties to submit objections, if any, to consolidation by February 10, 2017. After the Court issued its orders, the parties conferred to discuss their positions on consolidation. The parties agree that the Court should consolidate these cases, but differ on the nature of the consolidation that should be ordered. The parties agree that the Court should designate *Sanders*, Civ. No. 2:16-2356-RMG as the lead case.

A. Plaintiffs’ Position.

Plaintiffs believe these cases should be consolidated for the purpose of discovery only.

B. United States’ Position.

The United States believes these cases should be consolidated for all purposes because they share identical liability issues and the Court will resolve liability on a common set of facts.

Respectfully submitted, February 9, 2017,

s/ Gedney M. Howe, III	CHAD A. READLER
on behalf of all plaintiffs by	Acting Assistant Attorney General
s/ Stephen R. Terrell <i>per e-mail authorization</i>	Civil Division

dated February 9, 2017

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CERTIFICATE OF SERVICE

I certify that on February 9, 2017, I uploaded the attached documents to the Court's CM/ECF System, which will automatically generate and send a Notice of Electronic Filing (NEF) to all filing users associated with these cases.

s/ Stephen R. Terrell
STEPHEN R. TERRELL